

The court incorporates by reference in this paragraph and adopts as the findings and orders of this court the document set forth below. This document was signed electronically at the time and date indicated, which may be materially different from its entry on the record.



Dated: 04:16 PM February 14, 2022

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

In re: ) Case No. 21-61491  
SQUIRRELS RESEARCH LABS, LLC, et ) Chapter 11  
al., )  
Debtors. ) Jointly Administered  
 ) Judge Russ Kendig  
 )  
 )

**AGREED ORDER GRANTING MOTION FOR 2004 EXAMINATION, IN PART**

The Court has been informed that Debtor Squirrels Research Labs, LLC (“SQRL”) and Creditor Carl Forsell (“Forsell”) have been in communication regarding Forsell’s Motion for Rule 2004 Examination and Production of Documents (Doc. No. 132), some documents have been produced by SQRL to Forsell, and SQRL and Forsell have agreed upon the following:

1. Counsel for Forsell may conduct an oral 2004 Examination of a representative of SQRL at a time in the future to be agreed upon by the parties, at least two weeks prior to any deadline to object to confirmation of SQRL’s chapter 11 plan;
2. Forsell may make ongoing document requests to SQRL;
3. SQRL may produce documents pursuant to Forsell’s ongoing requests, but reserves the right to object to any ongoing requests; and

4. Forsell reserves the right to refile a 2004 Motion or other similar motion should Forsell find SQRL's objection to any future document request unreasonable.
5. The hearing on February 15, 2022 at 2pm ET is adjourned, pursuant to this Agreed Order.

The Court, for good cause shown, **GRANTS, IN PART**, Forsell's 2004 Motion, limited by and consistent with the terms in this Agreed Order.

**IT IS SO ORDERED.**

# # #

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